

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PATRICIA CONNOR	)	
	)	
COMPLAINANT	)	
	)	
v.	)	CASE NO. 2005-00220
	)	
BELLSOUTH TELECOMMUNICATIONS, INC.	)	
	)	
DEFENDANT	)	

FIRST DATA REQUEST OF COMMISSION STAFF  
TO PATRICIA CONNOR

Pursuant to 807 KAR 5:001, Commission Staff requests that Patricia Connor file the original and four copies of the following information within 10 days of the date of this request, with a copy to all parties of record. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility.

1. Refer to Anna K. Chenault/Story's Durable Power of Attorney which was included in the original complaint. Explain why the Notary Public's jurat on that document is dated January 4, 2005, but Ms. Chenault/Story did not sign the document until May 27, 2005.

2. Respond to BellSouth's assertion that the Amended Schedule of Creditors filed on December 30, 2004 in Case No. 03-35075 in the U.S. Bankruptcy Court for the Western District of Kentucky (Louisville) was never scheduled in court or discharged. Provide proof, if any exists, that said Amended Schedule was entered, thus discharging the debt allegedly owed BellSouth.

3. Explain why the past due balance owed BellSouth at 610 Oak Branch Road was included in the December 30, 2004 Amended Schedule of Creditors filed in Patricia Connor's Chapter 7 bankruptcy action, if, as alleged, Ms. Connor is not responsible for that debt.

4. Provide any evidence (e.g., tax document, deed, lease, etc.) that supports Ms. Connor's claim that she did not reside at 610 Oak Branch Road from May 19, 1997 until December 17, 2003.

5. Provide proof that the balance due for service rendered at 610 Oak Branch Road is included in Ms. Chenault/Story's bankruptcy proceeding, Case No. 04-37602, in the U.S. Bankruptcy Court for the Western District of Kentucky (Louisville).



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Beth O'Donnell  
Executive Director  
Public Service Commission  
P. O. Box 615  
Frankfort, KY 40602

DATED: August 19, 2005

cc: Parties of Record